

DECLARATION OF JEFFREY MARTIN

The undersigned, Jeffrey Martin, declares as follows:

1. I have been asked by counsel for defendants Rangel-Rubio to review the construction and implementation of the Master Jury Wheel that was used to select Grand Jurors in this case and will be used to select Trial Jurors in this case.
2. On November 24th, 2020 Judge Benjamin W. Cheesbro ordered certain data to be supplied by the Clerk to be used in my analysis.
3. In my correspondence with the Jury Administrator, Linda G. Johnson, I was informed that the data need to be reviewed in the Savannah Courthouse.
4. Because I suffer from asthma and I am over age 60, I requested that some of the data which does not include any personal information be made available to me via mail or email.
5. Ms. Johnson graciously described the precautions in the Savannah Courthouse but reiterated that the data needed to be reviewed there.
6. Three types of data have been ordered in this case, information that includes no personal information, data files that only include information identified with the random juror number and not name or address, and data that includes personal information.
7. Given my health circumstances and the CDC's guidance against travel, I would prefer to receive the data that includes no personal information and the data files which only include the random juror number and not name or address to be supplied to me directly by mail, email, thumb drive, CD, or secure download.
8. For the information that includes personal information, I will coordinate with Ms. Johnson to view that information in the Savannah Courthouse.

INFORMATION THAT INCLUDES NO PERSONAL INFORMATION

9. The first type of data includes no personal information. These are Requests #1, #2, #4, #5, #7, #8, and #9.
10. Request #1 is the Jury Selection Plan. Ms. Johnson has supplied me the jury plan previously and this request is only to verify that the plan I have is the one applicable in this case. The jury plan is ten pages long.
11. Request #2 is for Forms AO-12. These forms only include aggregated demographic information compiled by the Clerk for each of the six divisions. The Form usually includes four pages for each division.
12. Request #4 is for the date when the Master Jury Wheel in this case was filled. All that is requested is the date to verify I have the applicable Master Jury Wheel.
13. Request #5 was granted as a duplicate request covered in Request #2. To that extent, nothing is expected from the Clerk in addition to Request #2.

14. Request #7 is for the date when grand jurors were summoned in this case. All that is requested is the date of the summoning to verify I have the applicable Master Jury Wheel.
15. Request #8 is for the number of persons summoned to be considered as grand jurors. All that is requested is the number to verify other data.
16. Request #9 is for the calculation of proportionality of the persons summoned to be considered as grand jurors. It is expected that this calculation appears on one page.
17. In all Requests #1, #2, #4, #5, #7, #8, and #9 are expected to comprise thirty-eight pages and do not include any sort of personal information.

DATA FILES ONLY IDENTIFIED WITH JUROR NUMBER AND NOT NAME OR ADDRESS

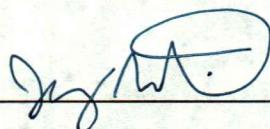
18. The second type of data is data files where the information is only identified by the randomly generated juror number and does not include name or address. These are Requests #10, #11, #12, #13, and #14.
19. Request #10 is for the Master Jury Wheel data. This data file would include the juror number and not name or address. There is no way to identify any individual from this data because the juror number is a random number created by the Clerk and vendor. Usually, this data is supplied as a data file or spreadsheet on a thumb drive, CD, or secure download.
20. Request #11 is for the Qualified Jury Wheel data. This data file would include the juror number and not name or address. There is no way to identify any individual from this data because the juror number is a random number created by the Clerk and vendor. Usually, this data is supplied as a data file or spreadsheet on a thumb drive, CD, or secure download.
21. Request #12 is for the status codes. This data file would include the juror number and not name or address. There is no way to identify any individual from this data because the juror number is a random number created by the Clerk and vendor. Usually, this data is supplied as a data file or spreadsheet on a thumb drive, CD, or secure download.
22. Request #13 is for the juror numbers of persons disqualified, excused, or not selected. The juror number is randomly generated and allows matching to the Master and Qualified Jury Wheels, but does not any identification of any name or address. Usually, this data is supplied as a data file or spreadsheet on a thumb drive, CD, or secure download.
23. Request # 14 is for the juror numbers of persons summoned to potentially become grand jurors. The juror number is randomly generated and allows matching to the Master and Qualified Jury Wheels, but does not any identification of any name or address. Usually, this data is supplied as a data file or spreadsheet on a thumb drive, CD, or secure download.
24. In all Requests #10, #11, #12, #13, and #14 would easily fit on one thumb drive or CD. It could also be supplied via a secure download.

DATA THAT INCLUDES PERSONAL INFORMATION

25. Request #17 is for the disposition of each summoned person considered for the grand jury.
26. It is expected that Request #17 would include personal information.
27. Because of the personal information, it is appropriate for this information to be protected and I would coordinate with Ms. Johnson on viewing this information in the Savannah Courthouse.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Dated this 29th day of December, 2020



Jeffrey Martin